

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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IN RE:	:	
Michael S. Raskay	:	Chapter 13
Denise E. Raskay	:	Case No. 22-10268-MDC
Debtor(s)	:	

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**RESPONSE TO THE MOTION FOR RELIEF OF AUTOMATIC STAY**  
**FILED BY WILMINGTON SAVINGS FUND SOCIETY, FSB**

Debtors, Michael and Denise Raskay, by and through their undersigned Counsel, Brad J. Sadek, in response to the Motion for Relief filed by Wilmington Savings Fund Society FSB, hereby submits the following:

1. Admitted
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted.
7. Admitted.
8. Admitted.
9. Admitted payments were missed. Debtors have a cure payment scheduled for May 19, 2022 and respectfully request the chance to catch up.
10. Debtors oppose the same.
11. Denied.
12. Denied.
13. Debtors agree to negotiate the same via Stipulation of Settlement.
14. Denied.

WHEREFORE, based on the aforementioned, Debtor respectfully requests that Movant shall be denied an Order granting relief of the Automatic Stay pursuant to 11 U.S.C. § 362.

Dated: May 17, 2022

/s/ Brad J. Sadek, Esq.

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Brad J. Sadek, Esq.  
Attorney for the Debtor  
Sadek & Cooper  
1315 Walnut Street, #502  
Philadelphia, PA 19107  
(215) 545-0008

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**CERTIFICATE OF SERVICE**

I, Brad J. Sadek, Esq. certify that on the date indicated below served a true and correct copy of the Debtor's Response to the Motion for Relief from Automatic Stay by electronic or Regular U.S. Mail on all creditors and the following parties:

**Kenneth E. West, Esq.**  
Standing Chapter 13 Trustee  
Electronic Notice

**Daniel P. Jones, Esq.**  
Attorney for Movant *Wilmington Savings Fund Society, FSB*  
Electronic Notice to *djones@sterneisenberg.com*

Dated: May 17, 2022

/s/Brad J. Sadek, Esq.  
Brad J. Sadek, Esq.  
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